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October 17, 2011

ADAM GREEN, TREASURER
PROGRESSIVE CHANGE CAMPAIGN
COMMITTEE
1630 R STREET NW #703
WASHINGTON, DC 20009

Response Due Date 11/21/2011

IDENTIFICATION NUMBER: C00458000

REFERENCE: MID-YEAR REPORT (01/01/2011 - 06/30/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 4 item(s):

- 1. Schedule A supporting Line 15 discloses the void of an offset received from "Shaunna Thomas". However, it appears that this offset was not previously reported by your committee. Please amend the appropriate reports(s) to disclose the original offset or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))
- **2.** Your report discloses \$61,760.54 from "PCCC Recall Committee (Wisconsin)" and "PCCC Recall Fund (Wisconsin IE)" in Offsets to Operating Expenditures on Line 15 of the Detailed Summary Page. Please be advised that if there are not corresponding expenditures for these entries, they may constitute excessive or prohibited contributions. Please amend your report or provide an explanation for these apparent discrepancies. (2 U.S.C 434(b) & 11 CFR § 104.3(a) and (b))
- **3.** Schedule B discloses expenditures for "Advertising", "GOTV phonebanking", "GOTV Predictive Dialer", "Media Consulting", "Printing", and "Printing and Copying". If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute in-kind contributions or independent expenditures and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity

PROGRESSIVE CHANGE CAMPAIGN COMMITTEE

Page 2 of 2

that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

4. On Schedule D of your previous report, you disclosed debt owed to your committee from "CONWAY FOR SENATE" and "KRYSTAL BALL FOR CONGRESS". These obligations, however, have been omitted from this report. Please amend your report to include this debt on Schedule D supporting Line 9 of the Summary Page. All debts and obligations must be disclosed until extinguished. (11 CFR §104.11)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1162.

Sincerely,

David Butler

Senior Campaign Finance Analyst

Reports Analysis Division